

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No. 06-
PATSY TOWNSEND : 18 U.S.C. §§ 1951(a) and 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Defendant and Other Individuals

1. At all times relevant to this Information:
 - a. Defendant PATSY TOWNSEND was the Deputy Fire Marshall for Monmouth County, New Jersey. Defendant PATSY TOWNSEND also worked for Neptune Township, New Jersey, as a code enforcement and emergency management official. Defendant PATSY TOWNSEND's duties with Monmouth County included the recommendation of no-bid emergency demolition contracts throughout Monmouth County to private entities.
 - b. There was a cooperating witness ("CW") and two federal law enforcement officers acting in undercover capacities ("UC1," "UC2," or collectively, the "UCs") who held themselves out to be part of a business involved in construction and

demolition work, the sale of stolen goods, illegal loan sharking, and money laundering of loan sharking proceeds. The CW and the UCs represented that this construction and demolition business was located primarily in the State of Florida, with their construction equipment being maintained in Florida and elsewhere, and that their purported illegal businesses were conducted interstate.

Extortionate Activity

2. Prior to November 17, 2004, defendant PATSY TOWNSEND learned that CW's business was seeking to secure the award of emergency demolition contracts in Monmouth County.

3. On or about November 17, 2004, defendant PATSY TOWNSEND met with UC1 in Atlantic City, New Jersey. During the meeting, defendant PATSY TOWNSEND agreed with UC1 to use defendant PATSY TOWNSEND's official position to assist UC1 and his business in obtaining emergency demolition contracts in Monmouth County. In exchange for his agreement, defendant PATSY TOWNSEND accepted a \$1,000 cash payment from UC1.

The Charge

4. On or about November 17, 2004, in Atlantic County, in the District of New Jersey, and elsewhere, defendant

PATSY TOWNSEND

knowingly and willfully attempted to obstruct, delay, and affect interstate commerce by extortion under color of official right --

that is, accepting and agreeing to accept \$1,000 in cash from UC1 in exchange for defendant PATSY TOWNSEND's official assistance in securing future emergency demolition contracts, as specific opportunities arose.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

CHRISTOPHER J. CHRISTIE
United States Attorney